# IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEBRASKA

IN THE MATTER OF:	)	CASE NO. BK22-40024
	)	CHAPTER 13
JASON BRADLEY KRUEGER and	)	
MICHELLE RENAE KRUEGER,	)	
	)	
Debtors.	)	

## MOTION TO DISMISS AND 9013 NOTICE

COME NOW the Debtors, by and through their attorney of record, and hereby move the Court for a dismissal of their Chapter 13 pursuant to U.S.C. § 1307(b) stating and showing to the Court that the case has not been converted under §§ 706, 1112 or 1208 of the Bankruptcy Code and further, the Debtors have proceeded in good faith.

WHEREFORE, the Debtors pray that the Court enter an ORDER dismissing the Chapter 13 proceeding for the reasons set forth herein, and for such other and further relief as deemed appropriate by the Court.

JASON BRADLEY KRUEGER and MICHELLE RENAE KRUEGER, Debtors

WOLFE SNOWDEN HURD AHL SITZMANN TANNEHILL & HAHN, LLP Wells Fargo Center 1248 O Street, Suite 800 Lincoln, NE 68508-1424 (402) 474-1507

By: /s/ John C. Hahn, 15068 jhahn@wolfesnowden.com

## **9013 NOTICE**

#### TO ALL PARTIES IN INTEREST AND TRUSTEE:

Please take notice that the Debtors above named have filed their MOTION TO DISMISS on February 14, 2022 with the United States Bankruptcy Court for the District of Nebraska, Lincoln, Nebraska.

Pursuant to Neb. R. Bankr. P. 9013-1, notice is given to all creditors and parties in interest that any resistance or objection to the Debtors' MOTION TO DISMISS shall be filed on or before March 7, 2022.

If no resistance or objection is filed on or before March 7, 2022 the Court shall enter an ORDER APPROVING MOTION TO DISMISS in accordance with Neb. R. Bankr. P. 3020. The Court shall consider such submission of the ORDER APPROVING MOTION TO DISMISS as meaning that no further hearing be scheduled and will consider entry of the ORDER without further notice.

All resistance to any motion shall set forth the specific factual and legal basis and conclude with a particular request for relief.

DATED this 14th day of February, 2022.

JASON BRADLEY KRUEGER and MICHELLE RENAE KRUEGER, Debtors

WOLFE SNOWDEN HURD AHL SITZMANN TANNEHILL & HAHN, LLP Wells Fargo Center 1248 O Street, Suite 800 Lincoln, NE 68508-1424 (402) 474-1507

By: /s/ John C. Hahn, 15068 jhahn@wolfesnowden.com

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was served upon all parties listed in the attached Court's Matrix by electronic transmission and by United States regular mail, postage prepaid, on this 14th day of February, 2022.

/s/ John C. Hahn, #15068 Attorney of Record

# Case 22-40024-BSK Doc 16 Filed 02/14/22 Entered 02/14/22 09:09:51 Desc Main

Label Matrix for local noticing 0867-4 Case 22-40024-BSK District of Nebraska Lincoln Office Fri Feb 11 13:06:08 CST 2022 Document Page 3 of 5 Ally Financial Lease Trust - Assignor to Veh 4515 N Santa Fe Ave. Dept. APS Oklahoma City, OK 73118-7901

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3